## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

Document 24

LIBERTY ENERGY SERVICES LLC,

Plaintiff,

ν.

Case No. 2:24-cv-00884-JRG-RSP

PROFRAC SERVICES, LLC; PROFRAC MANUFACTURING, LLC; U.S. WELL SERVICES, LLC; U.S. WELL SERVICES HOLDINGS, LLC,

Defendants.

## JOINT (AGREED) MOTION FOR ENTRY OF DISCOVERY ORDER

Plaintiff Liberty Energy Services LLC and Defendants ProFrac Services, LLC; ProFrac Manufacturing, LLC; U.S. Well Services, LLC; and U.S. Well Services Holdings, LLC file this *Joint (Agreed) Motion for Entry of Discovery Order* in the above-captioned case. The parties, agreeing to all terms in the proposed Discovery Order, attached hereto as Exhibit 1, respectfully request the Court grant this Motion and enter the agreed Discovery Order.

Dated: February 5, 2025 Respectfully submitted,

/s/ Robert H. Reckers

Robert H. Reckers (Texas Bar No. 24039520)

Lead Attorney

David W. Morehan (Texas Bar No. 24065790)

SHOOK, HARDY & BACON L.L.P.

600 Travis St., Suite 3400

Houston, TX 77002-2926

Phone: (713) 227-8008

Fax: (713) 227-9508

Email: rreckers@shb.com

Email: dmorehan@shb.com

respectfully sublifitied,

/s/ Rex A. Mann

Rex A. Mann (Texas Bar No. 24075509)

Thomas M. Melsheimer (Texas Bar No.

13922550)

Ahtoosa A. Dale (Texas Bar No. 24101443)

Alexander M. Nowakowski (Texas Bar No.

24139851)

WINSTON & STRAWN LLP

2121 North Pearl Street, Suite 900

Dallas, TX 75201

Phone: (214) 453-6500

Document 24

B. Trent Webb (Missouri Bar No. 40778)

Zachary M. Mass (Missouri Bar No. 77013)

SHOOK, HARDY & BACON L.L.P.

2555 Grand Blvd.

Kansas City, MO 64108-2613

Phone: (816) 474-6550 Fax: (816) 421-5547 Email: bwebb@shb.com Email: zmass@shb.com

Christopher P. Galligan (Illinois Bar. No.

6317988)

SHOOK, HARDY & BACON L.L.P. 111 S. Wacker Dr., Suite 4700

Chicago, IL 60606-4719

Phone: (312) 704-7700 Fax: (312) 558-1195

Email: cgalligan@shb.com

Mellissa R. Smith (Texas Bar No. 24001351)

GILLAM & SMITH, L.L.P.

303 South Washington Avenue

Marshall, Texas 75670 Phone: (903) 934-8450 Fax: (903) 934-9257

Email: melissa@gillamsmithlaw.com

Counsel for Plaintiff

Fax: (214) 453-6400

Email: TMelsheimer@winston.com Email: RMann@winston.com

Email: adale@winston.com

Email: anowakowski@winston.com

J. Tyler Boyce (Texas Bar No. 24127214)

WINSTON & STRAWN LLP 800 Capitol Street, Suite 2400

Houston, TX 77002 Phone: (713) 651-2600 Fax: (713) 651-2700

Email: TBoyce@winston.com

Counsel for Defendants

## **CERTIFICATE OF CONFERENCE**

I hereby certify that counsel in this case has complied with the meet and confer requirement set out in Local Rule CV-7(h) and that this motion is agreed to jointly by the parties and unopposed.

/s/ Robert H. Reckers